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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DARRELL WAYNE SMITH,

Defendant.

No. 4:23-cr-00110 YGR

JOINT STATEMENT OF THE CASE

Hon. Yvonne Gonzalez Rogers

Trial Date: March 17, 2025

1 The parties hereby jointly file this statement of the case.

2 STATEMENT OF THE CASE

3 The government has charged Darrell Wayne Smith with crimes related to his alleged sexual
4 abuse of female inmates of the Bureau of Prisons Federal Correctional Institute Dublin (“FCI Dublin”).
5 The government alleges that while a Correctional Officer at FCI Dublin, Mr. Smith sexually abused five
6 different inmates – Shayla, Lea, Claudia, Lisa, and Fabiola.

7 The charges against Mr. Smith are contained in an Indictment. The Indictment alleges fifteen
8 counts, which are summarized as follows:

- 9 a. Counts One through Six relate to Mr. Smith’s alleged abuse of Shayla.
- 10 a. In Counts One through Four, Mr. Smith is charged with abusive sexual contact in
11 violation of Title 18, United States Code, Section 2244(a)(4). Specifically in
12 Counts One and Two, the government alleges that Mr. Smith touched Shayla’s
13 buttocks on two separate occasions while in her cell at the prison. In Count
14 Three, the government alleges that Mr. Smith touched Shayla’s inner thigh and
15 groin while in her cell at the prison. Count Four alleges another instance of
16 Mr. Smith touching Shayla’s groin in her cell.
- 17 b. In Count Five, Mr. Smith is charged with aggravated sexual abuse in violation of
18 Title 18, United States Code, Section 2241(a). The government alleges that
19 Mr. Smith digitally penetrated Shayla’s anal opening by using force against
20 Shayla.
- 21 c. Finally, in Count Six, Mr. Smith is charged with deprivation of rights under
22 color of law in violation of Title 18, United States Code, Section 242. This
23 Count alleges that by digitally penetrating Shayla’s anal opening by using force
24 against Shayla, as alleged in Count Five, Mr. Smith deprived Shayla of the
25 Constitutional right not to be subject to cruel and unusual punishment.
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- 1 b. Counts Seven through Nine relate to Mr. Smith's alleged abuse of Lea. In each of these
2 counts, Mr. Smith is charged with sexual abuse of a ward in violation of Title 18, United
3 States Code, Section 2243(b).
- 4 a. Specifically, in Count Seven, the government alleges that Mr. Smith digitally
5 penetrated Lea's genital opening while in her prison cell. In Counts Eight and
6 Nine, the government alleges that Mr. Smith digitally penetrated Lea's genital
7 opening on two different occasions while in a laundry room in the prison.
- 8 c. Counts Ten through Thirteen relate to Mr. Smith's alleged abuse of Claudia. Mr. Smith
9 is charged in Counts Ten and Twelve with abusive sexual contact in violation of
10 Title 18, United States Code, Section 2244(a)(4), and in Counts Eleven and Thirteen
11 with sexual abuse of a ward in violation of Title 18, United States Code, Section
12 2243(b).
- 13 a. In Counts Ten and Twelve, the government alleges that Mr. Smith, on two
14 separate occasions, touched Claudia's breast and buttocks while in a laundry
15 room in the prison.
- 16 b. In Count Eleven, the government alleges that on a different occasion while in a
17 prison laundry room, Mr. Smith digitally penetrated Claudia's genital opening.
- 18 c. In Count Thirteen, the government alleges that Mr. Smith penetrated Claudia's
19 genital opening with his penis while in a janitor's closet at the prison.
- 20 d. Count Fourteen relates to Mr. Smith's alleged abuse of Lisa. In this count, Mr. Smith is
21 charged with abusive sexual contact in violation of Title 18, United States Code, Section
22 2244(a)(4). The government alleges that Mr. Smith touched Lisa's breast while in her
23 cell at the prison.
- 24 e. Count Fifteen relates to Mr. Smith's alleged abuse of Fabiola. In this count, Mr. Smith
25 is charged with sexual abuse of a ward in violation of Title 18, United States Code,
26 Section 2243(b). The government alleges that Mr. Smith digitally penetrated Fabiola's
27 genital opening while in her cell at the prison.
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1 Mr. Smith has pleaded not guilty to the charges against him and is presumed innocent unless and
2 until the government proves Mr. Smith's guilt beyond a reasonable doubt.

3 Assistant United States Attorneys Andrew Paulson and Sailaja M. Paidipaty will be prosecuting
4 this case and representing the United States of America. Mr. Smith is represented by defense counsel
5 Naomi Chung and Joanna Sheridan.

6 DATED: February 21, 2025

Respectfully submitted,

7 PATRICK D. ROBBINS
8 Acting United States Attorney

9 /s/ Andrew Paulson
10 ANDREW PAULSON
11 SAILAJA M. PAIDIPATY
Assistant United States Attorneys

12 DATED: February 21, 2025

13 /s/ Naomi Chung
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15 JOANNA SHERIDAN
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